*** REDACTED - FOR PUBLIC INSPECTION ***



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March 22, 2005

Mr. Jeffrey J. Carlisle Chief, Wireline Competition Bureau Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554

RE: Memorandum of Ex Parte Presentation

WC Docket No. 04-313, Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers

Dear Mr. Carlisle:

Since the Commission released its *Triennial Review Remand Order*, and in order to facilitate implementation of the new network unbundling rules, SBC has filed with the Commission or otherwise made available to CLECs detailed information regarding the application of the Commission's non-impairment thresholds for high capacity loop and transport facilities in wire centers in SBC's 13-state service territory. In particular, SBC filed a list of the wire centers that meet the relevant non-impairment criteria, and data underlying that list (including, by CLLI code, the number of fiber-based collocators, and the number of retail business, UNE-L and business UNE-P lines). SBC also has issued a series of Accessible Letters to its CLEC customers informing them of how and where they can obtain access to the list and underlying data, and explaining how SBC calculated the number of business lines and fiber-based collocators in any given wire center for purposes of applying the thresholds.³

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¹ Letter of James C. Smith, Senior Vice President, SBC Services, Inc. to Jeffrey J. Carlisle, Chief, Wireline Competition Bureau, FCC (filed Feb. 18, 2005); Letter of Brian Benison, SBC Services, Inc. to Jeffrey J. Carlisle, Chief, Wireline Competition Bureau, FCC (filed Feb. 22, 2005) (revising the list of SBC wire centers meeting the non-impairment criteria to correct three inadvertent errors); Letter of Thomas F. Hughes, SBC Services, Inc. to Jeffrey J. Carlisle, Chief, Wireline Competition Bureau, FCC (filed Mar. 18, 2005).

² Letter of Thomas F. Hughes, SBC Services, Inc. to Jeffrey J. Carlisle, Chief, Wireline Competition Bureau, FCC (filed Mar. 3, 2005); Letter of Thomas F. Hughes, SBC Services, Inc. to Jeffrey J. Carlisle, Chief, Wireline Competition Bureau, FCC (filed Mar. 18, 2005).

³ CLECALL05-037, issued March 3, 2005; CLECALL05-039, issued March 11, 2005; and CLECALL05-044, issued March 17, 2005.

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Over the past two weeks, a number of CLECs have asked SBC to further clarify how it applied the non-impairment criteria by further disaggregating the data underlying SBC's list of wire centers meeting those criteria. SBC believes that, based on the data it already has made available, CLECs are fully capable of completing the diligent inquiry concerning the application of the non-impairment criteria in particular wire centers, which is a prerequisite to ordering high capacity transmission facilities and loops under the new unbundling rules. Nevertheless, to further facilitate implementation of those rules, and as previously indicated in CLECALL05-039, SBC is filing the attached spreadsheet, which presents data underlying its list of wire centers meeting the non-impairment criteria in a further disaggregated format. In particular, the attached spreadsheet presents, for each wire center by CLLI code, the number of switched business lines as reported in ARMIS 43-08, 2-wire analog UNE-P business lines, DS1 UNE-P lines, 2-wire digital UNE-P business lines, 2-wire analog UNE loops, DS-1 UNE loops, DS-3 UNE loops, 2-wire digital UNE loops, total business lines and the number of fiber-based collocators.

The data submitted in the attached spreadsheets is highly confidential business information, showing the demand, by wire center, for switched business lines as reported in ARMIS 43-08 in SBC's territory, CLEC disaggregated UNE volumes and CLEC deployment of alternative facilities. SBC therefore is submitting the data under seal, pursuant to the September 20, 2004 Protective Order in the above-referenced docket. SBC is designating the data "Copying Prohibited" pursuant to that order. As noted above, SBC will make the data available pursuant to the terms of that order at the following location:

Kellogg, Huber, Hansen, Todd, Evans, and Figel P.L.L.C. 1615 M Street, N.W. Suite 400 Washington, D.C. 20036

Counsel for requesting carriers who wish to view the data should contact Kevin Walker at 202-367-7820 to schedule an appointment. As set forth in CLECALL05-039, SBC also will make the data available at other locations throughout SBC's 13-State Region to facilitate CLEC review of the data.

Please give me a call if you have any questions.

Sincerely,

/s/ Thomas F. Hughes

Attachment

WIRE CENTER CLLI CODE	STATE	Inspection COUNT	Solution Transport Transpo	Redacted for Public Inspection	Long The Count of	BUSINESS UNE-P BUSINESS UNE-P Diduction of bath of the properties	2-WIRE ANALOG UNE COUNT COUNT COUNT	Redacted for Public Inspection	Redacted for Public Inspection	See DICHAR ONE DICHAR ONE To be	uoitspeed (VOICE all of particular and particular a	TOTAL BUSINESS TOTAL BUSINESS TOTAL BUSINESS TOTAL BUSINESS TOTAL BUSINESS TOTAL BUSINESS	Redacted for Public Inspection
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LTRKARCA	AR												
LTRKARFR	AR												
LTRKARMO	AR												
ALHBCA01	CA												
ANHMCA01	CA												
ANHMCA11	CA												
BKFDCA12	CA												
BKLYCA01	CA												
BRBNCA11	CA												
BSRNCA70	CA												
BVHLCA01	CA												
CHICCA01	CA												
CLCYCA11	CA												
CMTNCA01	CA												
CNCRCA01	CA												
CNPKCA01	CA												
CORNCA11	CA												
CRDMCA11	CA												
CRLSCA12	CA												
DLMRCA12	CA												
ELMNCA01	CA												
ELSGCA12	CA												
ELTRCA11	CA												
ESCNCA01	CA												
FRMTCA11	CA												
FRMTCA12	CA												
FROKCA11	CA												
FRSNCA01	CA												
FRSNCA13	CA												
FUTNCA01	CA												
GLDLCA11	CA												
GRDNCA01	CA												
GRDNCA02	CA												

WIRE CENTER CLLI CODE	STATE	ARMIS 43-08 ARMIS 43-08 BUSINESS LINE COUNT	To COUNT COUNT	Redacted for Public Inspection	Long Time Digital UNE- to both a Business Line of Count	BUSINESS UNE-P BUSINESS UNE-P and pedacted (VOICE GRADE Logical (VOICE GRADE) [1]	Tool TINE COUNT Tool TINE COUNT Tool TINE COUNT	Redacted for Public Inspection	Redacted for Public Inspection	Redata True DIGITAL UNE policy connuctions and policy connuctions are presented in the connuction of t	uol per EQUIVALENT) Logical Control C	TOTAL BUSINESS	Redacted for Public Inspection
GRDNCA03	CA		_			_	_				_	_	
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HNPKCA01	CA												
HYWRCA11	CA												
IRVNCA11	CA												
IRVNCA12	CA												
LSANCA02	CA												
LSANCA03	CA												
LSANCA07	CA												
LSANCA08	CA												
LSANCA09	CA												
LSANCA10	CA												
LSANCA11	CA												
LSANCA34	CA												
LSANCA35	CA												
LVMRCA11	CA												
MDSTCA02	CA												
MLPSCA11	CA												
MTRYCA01	CA												
MTVWCA11	CA												
NAPACA01	CA												
NHWDCA01	CA												
NHWDCA02	CA												
NORGCA11	CA												
NSCRCA11	CA												
OKLDCA03	CA												
OKLDCA11	CA	1											

Public Public	Public Inspection
OKLDCA12 CA	•
ORNGCA11 CA	
ORNGCA14 CA	
PLALCA02 CA	
PLALCA12 CA	
PLTNCA13 CA	
PSDNCA11 CA	
RDCYCA01 CA	
RVSDCA01 CA	
SCRMCA01 CA	
SCRMCA02 CA	
SCRMCA11 CA	
SCRMCA12 CA	
SHOKCA01 CA	
SHOKCA02 CA	
SHOKCA05 CA	
SKTNCA01 CA	
SLNSCA01 CA	
SNANCA01 CA	
SNANCA11 CA	
SNBUCA02 CA	
SNCRCA11 CA	
SNDGCA01 CA	
SNDGCA02 CA	
SNDGCA03 CA	
SNDGCA15 CA SNDGCA16 CA	
SNDGCA16 CA SNFCCA01 CA	
SNFCCA01 CA SNFCCA04 CA	
SNFCCA04 CA SNFCCA12 CA	
SNFCCA12 CA SNFCCA21 CA	
SNJSCA02 CA	
SNJSCA12 CA	
SNJSCA14 CA	

WIRE CENTER CLLI CODE	STATE	ARMIS 43-08 ARMIS 43-08 BOSINESS TINE COUNT	2-WIRE ANALOG Silder And Tollogon South Analogon So	Bedacted for Public Inspection	Long Time Digital Constant of the constant of	BUSINESS UNE-P BUSINESS UNE-P action (VOICE GRADE BEQUIVALENT) [1]	Redacted for INSE COUNT Redacted for Repeated for Inspection	BED TOOLE TOOL TIME TO TIME TOOL TIME TO TIME TOOL TIME	DS3 UNE LOOP LINE COUNT Redacted for Public Inspection	Redaction Time DIGITAL UNE pilotopape 5-WIRE DIGITAL UNE to form the count of the c	UNE-LOOP (VOICE to plant and plant a	TOTAL BUSINESS TOTAL BUSINESS Total and personal solutions of the properties of the personal solutions of the personal sol	Redacted for COLLOCATION Redacted for Public Inspection
SNJSCA21	CA	-	•			•	•				•	•	
SNLNCA11	CA												
SNLOCA01	CA												
SNMCCA11	CA												
SNMTCA11	CA												
SNRSCA01	CA												
SNTCCA01	CA												
SNTCCA11	CA												
SNVACA01	CA												
SNVACA11	CA												
TRNCCA11	CA												
TUSTCA11	CA												
VISLCA11	CA												
VNNYCA02	CA												
WLANCA01	CA												
WNCKCA11	CA												
BRPTCT01	CT												
DNBRCT00	CT												
HRFRCT03	CT												
NWHNCT02	CT												
NWHNCT03	CT												
SMFRCT01	CT												
ARLHILAH	IL												
BLWDILBW	IL												
BNSVILBV	IL												
CHCGILCL	IL												
CHCGILED	IL												

WIRE CENTER CLLI CODE	STATE	Inspection COUNT	Topics of the control	Redacted for Public Inspection	Logorous Tones of Connection of the Connection o	BUSINESS UNE-P BUSINESS UNE-P Diduction of the policy of t	7-MIKE ANALOG UNE State The COUNT CO	BEGINNE COOLINE COUNT COUNT Public Inspection	Redacted for Public Inspection	Redatate DICHAL UNE POLICE DICHARD FOR THE COUNT INSPECTION	uoitspeed (VOICE silent and Inspection (VOICE silent)	TOTAL BUSINESS TOTAL BUSINESS TOTAL BUSINESS TOTAL BUSINESS TOTAL BUSINESS TOTAL BUSINESS	Redacted for Public Inspection
CHCGILFR	IL		•				-	. •			_	•	
CHCGILHB	IL												
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CHCGILKI	IL												
CHCGILLA	IL												
CHCGILLR	IL												
CHCGILLW	IL												
CHCGILMO	IL												
CHCGILNE	IL												
CHCGILSU	IL												
CHCGILWB	IL												
CHMPILCU	IL												
DSPLILXL	IL												
DWGVILDG	IL												
EGVGILEG	IL												
ELGNILEL	IL												
EMHRILET	IL												
GENVILGN	IL												
HFESILWL	IL												
HNDLILHI	IL												
LBRDILLM	IL												
LBVLILLI	IL												
LVPKILRN	IL												
NBRKILNB	IL												
NBRKILNT	IL												
NCHCILNC	IL												
NPVLILNA	IL												
NPVLILNE	IL												
OKBRILOA	IL												
PRRGILXL	IL												
RCFRILRE	IL												
RCFRILRT	IL												
RSLLILRZ	IL												
SCBGILCO	IL												

WIRE CENTER CLLI CODE	STATE	Redacted for COUNT COUNT	Language State Sta	BOSINESS ONE-P DSI BOSINESS ONE-P TINE COONL Redacted for Public Inspection	2-WIRE DIGITAL UNE- STATE BUSINESS LINE COUNT	BUSINESS UNE-P BUSINESS UNE-P COLIVALENT) [1]	Tool TIME COUNT Country Tool Time Count Redacted for Redacted for Inspection	BED TOOLE TOOL TIME TO TIME TOOL TIME TO TIME TOOL TIME	DS3 UNE LOOP LINE COUNT Redacted for Public Inspection	7-2-2-2-2-2-2-2-2-2-2-2-2-2-2-2-2-2-2-2	UNE-TOOP (VOICE club by page 12]	TOTAL BUSINESS	Redacted for Public Inspection
SKOKILSK	IL	_	_			_	•				_	-	- 1
SPFDILES	IL												
WHTNILWH	IL												
WKGNILWK	IL												
WLNGILWG	IL												
BLTNIN01	IN												
CRMLIN01	IN												
EVVLIN03	IN												
FSHRIN01	IN												
IPLSIN01	IN												
IPLSIN07	IN												
IPLSIN08	IN												
IPLSIN21	IN												
SBNDIN01	IN												
KSCYKSCB	KS												
KSCYKSJO	KS												
KSCYKSLE	KS												
KSCYKSNA	KS												
TPKAKSJA	KS												
WCHTKSAM	KS												
ANARMIMN	MI												
BRHMMIMN	MI												
BTCKMIBC	MI												
DRBRMIFB	MI												
DTRTMIBL	MI												
DTRTMICL	MI												
DTRTMIRV	MI												

WIRE CENTER CLLI CODE	STATE	ARMIS 43-08 ARMIS 43-08 BOSINESS TINE COUNT	2-WIRE ANALOG Silder And Tollogo and Paragrams of Count	d-SAN COUNT Redacted for Public Inspection	Page 1970 To Propose The Page 1970 To Page 1	BUSINESS UNE-P Diduy BUSINESS ONE-P Diduy BUSINESS ONE-P OIL STANDING OF THE PROPERTY OF THE P	Tool Tive Count of the Count of	Redacted for Public Inspection	Redacted for Public Inspection	Redated for COUNT COUNT COUNT	uoitspeed (AOICE all based on Inspection of Its and It	TOTAL BUSINESS TOTAL BUSINESS TOTAL BUSINESS TOTAL BUSINESS TOTAL BUSINESS TOTAL BUSINESS	Redacted for Public Inspection
ELNSMIMN	MI	•	•		•	•	•		•	. •	•	•	-
FLNTMIMN	MI												
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GDRPMIBL	MI												
GDRPMIES	MI												
GDRPMISO	MI												
JCSNMIMN	MI												
KLMZMIFA	MI												
LIVNMIMN	MI												
LIVNMINW	MI												
LNNGMIMN	MI												
LNNGMINW	MI												
MDLDMIMN	MI												
NRVLMIMN	MI												
OKMSMIMN	MI												
PLMOMIMN	MI												
PNTCMIMN	MI												
RSVLMIMN	MI												
RYLOMIMN	MI												
SFLDMIMN	MI												
SFLDMIOK	MI												
TROYMIMN	MI												
TROYMISM	MI												
WRRNMIMN	MI												
WYNGMILX	MI												
KSCYMO02	MO												
KSCYMO05	MO												
KSCYMO55	MO												
SPFDMOMC	MO												
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SPFDMOTU	MO												
STLSMO01	MO												
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WIRE CENTER CLLI CODE	STATE	ARMIS 43-08 ARMIS 43-08 BOSINESS LINE COUNT	2-WIRE ANALOG State of the control o	Redacted for Public Inspection	using the picture of the control of	BUSINESS UNE-P BUSINESS UNE-P COLIVALENT) [1]	Tool TIME COUNT Country Tool Time Count Tool Time Coun	Redacted for Public Inspection	Redacted for Public Inspection	Repair 5-WIRE DIGITAL UNE color by both color LINE COUNT	uoi pape EQUIVALENT) uoi pape EQUIVALENT)	TOTAL BUSINESS TOTAL BUSINESS TOTAL BUSINESS TOTAL BUSINESS TOTAL BUSINESS TOTAL BUSINESS	Redacted for Public Inspection
STLSMO08	MO	1 -	•		. •		•		. •		_	•	
STLSMO21	MO												
STLSMO27	MO												
STLSMO41	MO												
STLSMO42	MO												
RENONV02	NV												
AKRNOH25	ОН												
BCWDOH46	ОН												
BKPKOH26	OH												
CLEVOH42	OH												
CLEVOH62	OH												
CLEVOH64	OH												
CLMBOH11	OH												
CLMBOH86	OH												
DBLNOH89	ОН												
DYTNOH22	OH												
INDPOH52	OH												
TOLDOH21	OH												
WEVLOH88	OH												
WOTNOH88	OH												
OKCYOKCE	OK												
OKCYOKSK	OK												
TULSOKNA	OK												
TULSOKRI	OK												
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TULSOKWO	OK												
AMRLTX02	TX												

WIRE CENTER CLLI CODE	STATE	and the control of th	Solution Transport Transpo	Redacted for Public Inspection	Long The Count of	BUSINESS UNE-P BUSINESS UNE-P Diducted to Side Policy (VOICE GRADE) BUSINESS ON PROPERTY (VOICE GRADE)	Side of the control o	Bedacted for Public Inspection	Redacted for Public Inspection	Redate DIGITAL UNE pilons 5-WIRE DIGITAL UNE COUNT	uoitspeed (VOICE all of particular and particular a	TOTAL BUSINESS TOTAL BUSINESS TOTAL BUSINESS TOTAL BUSINESS TOTAL BUSINESS TOTAL BUSINESS	Redacted for Public Inspection
AMRLTXFL	TX	•	•		•	•	•					•	
AUSTTXFI	TX												
AUSTTXGR	TX												
AUSTTXHI	TX												
AUSTTXHO	TX												
AUSTTXTE	TX												
BWVLTXLI	TX												
CRCHTXTU	TX												
DLLSTXAD	TX												
DLLSTXEM	TX												
DLLSTXFB	TX												
DLLSTXFL	TX												
DLLSTXLA	TX												
DLLSTXMC	TX												
DLLSTXME	TX												
DLLSTXNO	TX												
DLLSTXRE	TX												
DLLSTXRI	TX												
DLLSTXRN	TX												
DLLSTXRO	TX												
DLLSTXTA	TX												
ELPSTXMA	TX												
FTWOTXCR	TX												
FTWOTXED	TX												
FTWOTXEU	TX												
FTWOTXTE	TX												
HSTNTX08	TX												
HSTNTXBA	TX												
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HSTNTXFA	TX												
HSTNTXGP	TX												
HSTNTXHO	TX												

WIRE CENTER CLLI CODE	STATE	ARMIS 43-08 ARMIS 43-08 BOSINESS LINE COUNT	2-WIRE ANALOG BUSINESS UNE-P LINE COUNT	Redacted for Public Inspection	using the picture of the control of	BUSINESS UNE-P oildud BUSINESS UNE-P oildud BUSINESS ONE-P and be EQUIVALENT) [1]	Tool TIME COUNT Country Tool Time Count Tool Time Coun	Redacted for Public Inspection	Redacted for Public Inspection	Redaction Time DIGITAL UNE pilotopapa 5-WIRE DIGITAL UNE to for properties of the pilotopapa for the pilotop	uoitope (VOICE oileann) oileann oilea	TOTAL BUSINESS TOTAL BUSINESS TOTAL BUSINESS TOTAL BUSINESS TOTAL BUSINESS TOTAL BUSINESS	Redacted for Public Inspection
HSTNTXJA	TX	_	•			•	•		. •		•	•	
HSTNTXMC	TX												
HSTNTXMO	TX												
HSTNTXNA	TX												
HSTNTXOV	TX												
HSTNTXOX	TX												
HSTNTXPR	TX												
HSTNTXSU	TX												
HSTNTXUN	TX												
LARDTXLA	TX												
LBCKTXPS	TX												
LBCKTXSW	TX												
MCALTXMU	TX												
MDLDTXMU	TX												
SNANTXBA	TX												
SNANTXCA	TX												
SNANTXDI	TX												
SNANTXFR	TX												
SNANTXPE	TX												
SNANTXTA	TX												
SNANTXWE	TX												
TYLRTXLY	TX												
APPLWI01	WI												
DEPRWI11	WI												
EUCLWI01	WI												
GNBYWI01	WI												
GNBYWI11	WI	1											

WIRE CENTER CLLI CODE	STATE	Inspection COUNT	2-WIRE ANALOG To be be considered and considered an	Redacted for Public Inspection	2-WIRE DIGITAL UNE- P BUSINESS LINE COUNT	BROSINESS UNE-P BROSINESS UNE-P CAPPED TOTAL (VOICE GRADE POINT ALENT) [1]	7-MIKE ANALOG UNE Sedated for Police Redacted	BREACTED TIME TOOL TIME COUNT Redacted for Public Inspection	Redacted for Public Inspection	Redacted for Public Inspection	uoitspeed (VOICE solution)	TOTAL BUSINESS	Redacted for COLLOCATION
MDSNWI11	WI			•	•			•	•	·			
MDSNWI12	WI												
MDSNWI13	WI												
MDSNWI14	WI												
MDSNWI15	WI												
MDSNWI16	WI												
MILWWI12	WI												
MILWWI13	WI												
MILWWI16	WI												
MILWWI45	WI												
NENHWI11	WI												
OSHKWI01	WI												
WKSHWI47	WI												
			<u> </u>				1						

NOTES:

[1] BUSINESS UNE-P voice grade equivalent calculation:

Each 2-WIRE ANALOG BUSINESS UNE-P LINE = 1 equivalent voice grade line

Each DS1 BUSINESS UNE-P LINE = 24 equivalent voice grade lines

Each 2-WIRE DIGITAL UNE-P BUSINESS LINE = 2 equivalent voice grade lines

[2] UNE-LOOP voice grade equivalent calculation:

Each 2-WIRE ANALOG UNE LOOP LINE = 1 equivalent voice grade line

Each DS1 UNE LOOP LINE = 24 equivalent voice grade lines

Each DS3 UNE LOOP LINE = 672 equivalent voice grade lines

Each 2-WIRE DIGITAL UNE LOOP LINE = 2 equivalent voice grade lines